



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

SEP 19 2014

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL 7009 1680 0000 7677 8305**  
**RETURN RECEIPT REQUESTED**

Mr. William E. Murphie  
Manager  
Portsmouth/Paducah Project Office  
U.S. Department of Energy  
1017 Majestic Drive, Suite 200  
Lexington, Kentucky 40513

Mr. Dennis Carr  
Fluor-B&W Portsmouth, LLC  
Post Office Box 548  
Piketon, Ohio 45661

Re: Notice of Violation  
RCRA Compliance Inspection  
U.S. DOE Portsmouth Gaseous Diffusion Plant, Piketon, Ohio  
OH7 890 008 983

Dear Messrs. Murphie and Carr:

On March 24 through March 26, 2014, representatives of the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency (Ohio EPA) inspected the U.S. Department of Energy (DOE) Portsmouth Gaseous Diffusion facility ("Portsmouth facility") located in Piketon, Ohio. The purpose of the inspection was to evaluate U.S. DOE's and Fluor-B&W Portsmouth, LLC (FBP) compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation and storage of hazardous waste. We have enclosed a copy of the RCRA inspection report for your reference. In addition, EPA acknowledges receiving several e-mails from U.S. DOE since the March 24, 2014 inspection.

Based on information provided by DOE and FBP personnel, review of records and physical observations by the inspectors, EPA finds that the Portsmouth facility was not in compliance with certain requirements of the Ohio Administrative Code (OAC), the United States Code of Federal Regulations (CFR) and the RCRA Hazardous Waste Installation and Operation Permit license issued by Ohio EPA to the DOE for the Portsmouth Facility.



- 1) The Portsmouth facility's Ohio Hazardous Waste Facility Installation and Operation Permit Renewal, dated March 25, 2011, includes General Facility Conditions in Module B. Specifically, the permit states in section B.24 Manifest System, that "in the management of waste at the facility, the Permittee shall comply with the provisions of OAC Chapter 3745-52 and OAC Rules 3745-54-71, 3745-54-72 and 3745-54-76 with regard to the manifest system." Pursuant to OAC Chapter 3745-52-20(A), a generator of hazardous waste who transports, or offers for transportation, hazardous waste for off-site treatment, storage, or disposal must prepare a manifest on U.S. EPA form 8700-22 according to the instructions in the appendix to 40 C.F.R. Part 262, before transporting the hazardous wastes off-site. Completion of item I, U.S. EPA form 8700-22, and if necessary, item R, U.S. EPA form 8700-22A, and relating to the U.S. EPA waste number, is required in addition to completion of items one through twenty and items twenty-one through thirty-five respectively, on these forms. See, OAC Rule 3745-52-20(A) and (B).

During the records review portion of the inspection, the inspectors observed that eight TSD manifest copies for shipments to DSSI/Permafix Environmental Services, Kingston, Tennessee were missing the Hazardous Waste Report Management Method Codes in Item 19 of the hazardous waste manifest (manifest tracking numbers 001596125 GBF, 001596126 GBF, 001596128 GBF, 001596129 GBF 001596140 GBF, 001596141 GBF, 001596142 GBF, and 001596144 GBF). At the time of the inspection, DOE and FBP were in violation of OAC Rule 3745-52-20(B) [40 CFR § 262.20] and Section B.24 of the Portsmouth facility RCRA Permit.

- 2) A generator who ships any hazardous waste off-site must prepare and submit to Ohio EPA a "Generator Annual Hazardous Waste Report" by March 1st of each year. The Generator Annual Hazardous Waste Report must be prepared using the forms and instruction supplied by the director upon the request of the generator, must cover generator activities during the previous year, and must include certain information. See, OAC Rule 3745-52-41(A). The annual report must be prepared in accordance with applicable provisions of OAC Rules 3745-50-40 to 3745-50-62 and Chapters 3745-54 to 3745-57, 3745-58, and 3745-65 to 3745-69 of the Administrative Code. See, OAC Rule 3745-52-41(B).

During the inspection of Building X-710, Rooms 285 and 216, the inspectors were told that DOE/FBP personnel generate acid hazardous waste that they neutralize and place down the drain. The DOE/FBP 2013 Annual Hazardous Waste Report does not include the volume of acid waste neutralized on-site in Building X-710. At the time of the inspection, DOE/FBP was in violation of OAC Rule 3745-52-41(B).

Please include in your response a list of laboratories and room numbers in Building X-710 that generate and neutralize hazardous wastes that are placed down the drain, as well as waste determination information on each waste stream.



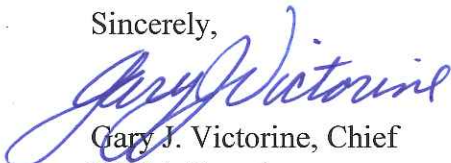
Area of Concern

Although RCRA regulations do not require training of personnel working in Satellite Accumulation Areas (SAA), personnel working in SAAs should be familiar enough with the chemicals with which they are working to know when they have generated a RCRA hazardous waste so that it is managed in accordance with the RCRA regulations. During the inspection of Building X-710, inspectors were told that laboratory staff generate corrosive waste that is neutralized and placed down the drain. However, the staff generating wastes at SAA containers had not received any hazardous waste training. We recommend that the staff who are generating and neutralizing hazardous waste receive hazardous training and annual refresher classes.

Under Section 3008(a) of RCRA, 42 U.S.C. § 6928, EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

If you have any questions regarding this letter, please contact Walt Francis, of my staff, at (312) 353-4921.

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosures

cc: Melody Stewart, OEPA – Southeast District Office  
([melody.stewart@epa.ohio.gov](mailto:melody.stewart@epa.ohio.gov))  
Bruce McCoy, Ohio EPA – Columbus Office  
([bruce.mccoy@epa.ohio.gov](mailto:bruce.mccoy@epa.ohio.gov))  
Vince Adams, U.S. DOE Portsmouth Site Director  
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U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

**FACILITY NAME:** U.S. DOE PORTSMOUTH GASEOUS DIFFUSION PLANT

**FACILITY U.S. EPA ID NO.:** OH7 890 008 983

**FACILITY TYPE:** Large Quantity Generator and Container Storage Facility

**FACILITY ADDRESS:** 3930 US Route 23 South  
Piketon, Ohio 45661

**U.S. EPA REPRESENTATIVE:** Walt Francis

**DATE(S) OF INSPECTION:** March 24 through March 26, 2014

**SIC CODE:** 2819 - Industrial Inorganic Chemicals, Not Elsewhere Classified

**NAICS CODE:** 325188 - All Other Basic Inorganic Chemical Manufacturing

**PREPARED BY:** Walt Francis  
Walt Francis  
Environmental Scientist

4/14/2014  
Date

**ACCEPTED BY:** Julie Morris  
Julie Morris, Chief  
Compliance Section 2  
RCRA Branch

4/18/14  
Date

### **Purpose of Inspection**

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the U.S. Department of Energy Portsmouth Gaseous Diffusion Plant (Portsmouth), Piketon, Ohio to determine its compliance with the Resource Conservation and Recovery Act (RCRA), the Ohio Administrative Code (OAC), and the RCRA Permit requirements with respect to U.S. DOE's and Fluor-B&W Portsmouth, LLC's management of hazardous waste, universal waste and used oil as part of a U.S. EPA multimedia inspection.

### **Participants**

U.S. Environmental Protection Agency (U.S. EPA) Inspectors -

Walt Francis, Environmental Scientist

Lynne Roberts, Environmental Scientist

Jennifer Welch, Environmental Engineer

Jonathan Moody, Environmental Engineer

Arturo Cisneros, Environmental Scientist

Ohio Environmental Protection Agency (Ohio EPA) Inspectors -

Melody Stewart, Hazardous Waste Inspector

Maria Galanti, Environmental Specialist II

Jack Knapp, Environmental Specialist II

Representatives of U.S. DOE, Fluor-B&W Portsmouth, LLC (FBP), Wastren-EnergX Mission Support, LLC (WEMS), Restoration Services (RSI), United States Enrichment Company/American Centrifuge Plant (USEC/ACP), and Babcock and Wilcox Conversion Services (BWCS) -

Kristi Wiehle, U.S. DOE

Amy Lawson, U.S. DOE

Rosemary Richmond, RSI

Jason Lovins, FBP

Bob Nichols, FBP

Sandy Childers, Insolves

Dennis Carr, FBP

Fred Hughes, FBP

Eric Foster, FBP

Ryan Conkel, FBP

Robert Blythe, FBP

Dean Lobdell, FBP

Marilew Bartling, FBP

John McCoy, FBP



Cidney Voth, DOE Oversight Operations  
Greg Uetrecht, RSI  
Bob Anderson, WEMS  
Chris Guilliams, FBP  
Jeremy Davis, RSI  
Bob French, FBP  
Frank Johnston, FBP  
Sue Fulk, USEC/ACP  
Carolyn Hamilton, USEC/ACP  
Roger Coates, BWCS  
Jyh-Dong Chion, FBP  
David McClay, United Steel Worker Safety  
Greg Goslon, USEC/ACP  
Christopher Brust, USEC/ACP  
Nathan Banks, USEC/ACP

#### **Site Description/Background Information**

Historically, the main function of the Portsmouth facility was to enrich uranium for military use (nuclear submarines and nuclear weapons) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in uranium hexafluoride (UF<sub>6</sub>) feedstock which contains 0.711% U235. The Portsmouth facility was constructed from 1952 to 1956 and had produced enriched uranium continuously since September 1954. In 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). U.S. DOE retained ownership of the ongoing site environmental restoration program as well as the permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and were leased by USEC. As of March 2012, U.S. DOE and FBP activities included decontamination of equipment and uranium recovery (X-705 Building); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in U.S. DOE owned and permitted storage facilities. Waste generated by U.S. DOE and FBP from the environmental restoration is also stored in these facilities. U.S. DOE also generates non mixed radioactive hazardous waste, universal waste and used oil which is shipped out of Building XT-847. USEC ceased the enrichment process in May 2001, and discontinued on-site operations on October 10, 2011. U.S. DOE and FBP manage hazardous waste, universal waste and used oil generated from on-site maintenance, on-site storage activities, remediation and demolition activities.

Uranium contaminated hazardous wastes (mixed waste) which were generated by USEC and are generated by U.S. DOE and FBP are stored on-site in U.S. DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of treatment, storage and disposal (TSD) facilities in the United States which could accept mixed waste, and a May 1991 U.S. DOE moratorium on off-site waste shipment. A large percentage of the waste generated at Portsmouth is U.S. DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in U.S. DOE-owned storage areas. U.S. DOE sends some waste off-site (to U.S. DOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to U.S. DOE - Portsmouth for storage in the interim prior to their final disposal.

U.S. DOE/FBP generated hazardous wastes are primarily shipped to Energy Solutions, Clive, Utah (UTD982598898), DSSI/Perma-Fix, Kingston, Tennessee (TND982109142), Perma-Fix, Oak Ridge, Tennessee (TNR000005397), EQ Detroit, Detroit, Michigan (MID980991566), and Chemical Waste Management, Emelle, Alabama (ALD000622464). In addition, a wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes. Babcock & Wilcox Conversion Services is working on a project to recover Hydrofluoric Acid and Uranium Oxide material from depleted uranium hexafluoride (DUF6) cylinders.

On March 25, 2011 Ohio EPA renewed the RCRA Permit for the Portsmouth facility. The renewed RCRA Permit includes six container storage areas in Building X-326. The renewed RCRA Permit states in Section B.36(m) that U.S. DOE/FBP may store restricted waste beyond one year; however, the Permittee bears the burden of proving that such storage was solely for the purpose of accumulating such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal [OAC Rule 3745-270-50].

### **Opening Conference**

On March 24, 2014 Walt Francis, Lynne Roberts, Jennifer Welch, Jonathan Moody and Melody Stewart arrived at Building X-1000 at approximately 8:00 a.m. and informed the U.S. DOE, RSI, FBP, USEC/ACP, and BWCS representatives of the nature, scope, and procedures for the multimedia inspection. The inspection was conducted by U.S. EPA and Ohio EPA personnel as a Federal lead inspection. The facility representatives provided the team with a brief update of the facility, and a list of current hazardous waste satellite accumulation area (SAA) containers, hazardous waste less than 90 day accumulation areas, and universal waste accumulation areas. The current site activities include: Decontamination and Decommissioning (D&D); the DUF6 Conversion Plant; and the ACP research and demonstration. The Portsmouth site currently has approximately 2,900 employees. Ms. Lawson did not make a confidential business information claim on the information gathered during the inspection. Ms. Amy Lawson allowed the inspectors access to the facility to conduct the inspection.

## Site Tour

The RCRA inspection team included Mr. Chris Guilliams, Ms. Melody Stewart and Mr. Walt Francis. The inspection began at Building X-624. Mr. Guilliams introduced Mr. Greg Thompson, Ground Water Treatment Facility Operations Supervisor. Mr. Thompson showed the inspectors a 55-gallon SAA container labeled "F001, Bag Filters, PPE, Plastic". The walk-through continued to Building X-752. Mr. Guilliams introduced Mr. Kevin Cawley, Facility Manager. Mr. Cawley took the inspectors to Building X-752. The inspectors observed five 55-gallon containers labeled "Lead". Mr. Guilliams told the inspectors that the lead material was lead bricks used for shielding. Mr. Cawley showed the inspectors a container of used oil and a less than 90 day hazardous waste accumulation area (Area "Bay R"). Inspector Francis observed a container labeled "Aerosol Cans, D001" with a "3/18/14" accumulation date. Also, Mr. Cawley showed the inspectors a SAA container labeled "Used Oil Filters Pending Analysis, 3/19/14". The walk-through continued to Warehouse 9. Mr. Cawley showed the inspectors new 55-gallon containers in storage and excess material. The inspection continued to Building X-720. Mr. Guilliams introduced Ms. Beverly Kelley. Ms. Kelley showed the inspectors an area with universal waste and hazardous waste containers. Inspector Francis observed four 30-gallon containers and one 55-gallon container dated "3/8/14, 1/22/14, 3/18/14, 3/20/14, and 3/11/14". The walk-through continued in Building X-720 to Column J11. Ms. Kelley showed the inspectors a 55-gallon SAA container labeled "Excess Chemicals". The walk-through continued to Column L15. Ms. Kelley showed the inspectors a 5-gallon SAA container. The walk-through continued to another SAA 5-gallon container at column L15. The walk-through continued to the "Cleaning Room". Ms. Kelley showed the inspectors three SAA polybottles. The walk-through continued to the Radio Shop. Ms. Kelley showed the inspectors a 5-gallon SAA container utilized for "ITM Sensors". The walk-through continued to the Air Pal Shop. Ms. Kelley showed the inspectors a 5-gallon SAA container. The walk-through continued to a universal waste accumulation area. Ms. Kelley showed the inspectors fifteen boxes of 4-foot used fluorescent lamps and 6 boxes of 8-foot used fluorescent lamps. The walk-through continued to Building X-720C. Ms. Kelley showed the inspectors a hazardous waste less than 90 day accumulation area. Inspector Francis observed a 55-gallon container labeled "Diesel Fuel, D001, 3/10/14", a 5-gallon container labeled "D001, 1/15/2014", and two containers labeled "Gasoline, D019, 3/21/14". Inspector Francis also observed several 55-gallon containers labeled "Used Oil", and a 55-gallon container labeled "Oil, Rags and Metal Shavings" in Building X-720C. The walk-through continued to Building X-700. Mr. Bob Anderson showed the inspectors a 15-gallon SAA container of used aerosol cans (D001), a 30-gallon SAA container of used solvent rags (F005), a 5-gallon SAA container of waste paint thinner, several containers labeled "Used Oil", and a container of used antifreeze. Mr. Anderson showed the inspectors a universal waste accumulation area. Inspector Francis observed several containers of used fluorescent lamps dated "8/21/13" and "10/3/13". The walk-through continued to a less than 90- day hazardous waste accumulation area that was empty in Building X-700. The walk-through continued through Building X-700. The inspectors observed an accumulation container of used toner cartridges. The walk-through continued to another area in Building X-700 where universal waste

used fluorescent lamps were accumulated. Mr. Guilliams introduced Mr. Bryan Jones. Mr. Jones showed the inspectors several boxes of used fluorescent lamps. Inspector Francis noted that the boxes were marked with a "3/14/14" accumulation date. The walk-through continued to a hazardous waste less than 90 day accumulation area. Inspector Francis observed a container labeled "Unknown Liquid, 3/11/14", and a container labeled "Tank Overflow, 2/17/14". The walk-through continued to Building X-623. Mr. Greg Thompson showed the inspectors a 55-gallon SAA container labeled "PPE, Plastic, and Bag Filters". The walk-through continued to Building X-627. Mr. Greg Thompson showed the inspectors a 55-gallon SAA container labeled "PPE, Plastic, Bag Filters, F001". The walk-through continued to Building X-333. Mr. Jack Snyder showed the inspectors a 1-gallon container utilized for universal waste bulbs. Inspector Francis noted that the container was dated "1/16/14". The walk-through continued to a universal waste accumulation area at Column C-10 which was empty. The walk-through continued to Building X-330. Ms. Vickie Glenn and Mr. Jim McMahn took the inspectors to the Electrical Shop. Ms. Glenn showed the inspectors an SAA container utilized for broken bulbs at Column G-43. The walk-through continued to a universal waste accumulation area at column W-34. Ms. Glenn showed the inspectors several boxes of used fluorescent lamps. Inspector Francis noted that the boxes were labeled and dated. The walk-through continued to a 5-gallon SAA container of waste rags at Column EE-35. The walk-through continued to a hazardous waste less than 90-day accumulation area at Column L-49. Inspector Francis noted that the area was empty. The walk-through continued to another universal waste accumulation area at Column G-38. The walk-through continued to Building X-344. Mr. R.J. Lyons showed the inspectors an SAA container in the autoclave area. The walk-through continued to another SAA container at Column E-17 utilized for used sensors. Mr. Lyons showed the inspectors an area for accumulation of electronic scrap, and two 55-gallon containers of used oil at Column E-15. Mr. Lyons also showed the inspectors an accumulation area for universal waste used four-foot fluorescent lamps. Inspector Francis noted that the boxes were labeled and dated. The walk-through continued to Building X-530. Mr. Guilliams showed the inspectors a universal waste accumulation container and a 55-gallon used oil container. The inspectors returned to Building X-1000 for a daily closeout meeting.

On March 25, 2014, Mr. Guilliams took the inspectors to Building X-622. Mr. Greg Thompson showed the inspectors a 55-gallon SAA container labeled "F001, Bag Filters, PPE, Plastic". The walk-through continued to Building X-705. Mr. Marvin Ross directed the inspectors to don coveralls and meet in a conference room. The inspectors met Mr. Jeff Woodard and received a brief safety-orientation prior to entering the radiation zone in Building X-705. The inspectors donned another pair of coveralls, shoe covers, a pair of booties and three pairs of gloves. Mr. Ross took the inspectors into the radiation zone in Building X-705. Mr. Ross showed the inspectors a hazardous waste less than 90-day accumulation area which was empty. The walk-through continued to a universal waste accumulation area. Mr. Ross showed the inspectors a container of four-foot universal waste used lamps, and two 55-gallon containers of used lamps. Inspector Francis noted that the box of used lamps was labeled and dated "2/19/14". The walk-through continued to the Group 2 Cage area at Column G-19. Mr. Ross showed the inspectors several containers of hazardous waste. The walk-through continued to an SAA container at the

microfiltration device. Mr. Ross showed the inspectors that the container was empty. The walk-through continued to a SAA container at Column AA-9 Mezzanine Cage. The walk-through continued to Building X-326. Mr. Chris Ashley met the inspectors and explained that some sampling was occurring in RCRA hazardous waste storage Area #5. The walk-through continued to RCRA Storage Area #2. Inspector Francis noted a container labeled "D010, MC1814 Gunk, RFD 65311, 10/23/13". The walk-through continued to Area #4 and Area #3. The walk-through continued to the "West L-Cage". Inspector Francis noted a polybottle labeled "D002, X-710, 10/13/13, RFD #13-006867". The walk-through continued to the "East L-Cage". Inspector Francis noted a container labeled "Ash, 13-003618, D006/D007/D008/D009/D011, 3/3/92". Mr. Ashley pointed out several polybottles from Building X-705. The walk-through continued to Column C-71. The walk-through continued to a universal waste accumulation area at Column C-49 Operations Floor. The walk-through continued to a less than 90-day hazardous waste accumulation area at Column T-82. At Column R-80, the inspectors observed a green rusty 55-gallon container. Mr. Guilliams told the inspectors that it was a product. The walk-through continued to a universal waste accumulation area at Column C-49. The inspectors observed several four-foot boxes of used fluorescent lamps dated "3/21/14". The walk-through continued to a hazardous waste less than 90-day accumulation area at Column C-48 which was empty. The walk-through continued to a new hazardous waste less than 90-day accumulation area at Column N-11 which was empty. The walk-through continued to Building X-300. Mr. Guilliams showed the inspectors a one-gallon container utilized for accumulating universal waste. Inspector Francis noted that the container was labeled "3/4/14". The walk-through continued to Building X-750. Mr. Guilliams introduced Mr. Caleb Miller, Facility Manager and Ms. Beverly Kelley. Ms. Kelley showed the inspectors a hazardous waste less than 90-day accumulation area which included a container of used antifreeze, two 55-gallon containers of hazardous waste from Building X-743, one 5-gallon container of used aerosol cans dated "3/14/14". The walk-through continued to the South High Bay Area. The inspectors observed a 5-gallon SAA container utilized for waste rags and a container utilized for universal waste bulbs dated "10/22/13". Inspector Francis observed a 55-gallon container labeled "Ozzy Juice, Pending Analysis". The walk-through continued to an area with used oil containers and used lead acid batteries. Ms. Kelley told the inspectors that USA Lamp and Ballast picks up the used lead acid batteries. Inspector Francis observed a red vehicle oil changing collection device in this area. The container was unlabeled but empty. The inspectors toured the area outside Building X-750. Inspector Stewart requested photographs of several areas with oil staining on the ground. The walk-through continued to Building X-710. The inspectors met Mr. Brian Pyles. Mr. Pyles took the inspectors to Room #152 Cold Laboratory and showed them an SAA container. Inspector Francis noted that the SAA container was labeled "PPE". The walk-through continued to Room #154. Mr. Pyles showed the inspectors a 5-gallon SAA container labeled "Chromic Acid". The walk-through continued to an SAA area in Room #157. Mr. Pyles showed the inspectors two polybottles. The walk-through continued to Room #142. Mr. Pyles showed the inspectors one SAA container. The walk-through continued to Room #144. Mr. Pyles showed the inspectors a hazardous waste less than 90-day accumulation area in a radiation area. The walk-through continued to Room #124. Mr. Pyles showed the inspectors a 5-gallon SAA container labeled "Lab Waste". The walk-through continued to Room #111. Mr. Pyles showed

the inspectors a 30-gallon SAA container. The walk-through continued to Room #114. Mr. Pyles showed the inspectors a SAA polybottle. The walk-through continued to the loading dock. Mr. Pyles showed the inspectors a universal waste accumulation area. Inspector Francis noted that the boxes were labeled and dated "2/11/14", "2/12/14", "11/12/13", and "10/29/13". The walk-through continued to the hazardous waste less than 90-day accumulation area adjacent to the loading dock. Mr. Pyles showed the inspectors several containers of hazardous waste. Inspector Francis noted a container labeled "Methanol, ETOH, MEOH, 14-00191, 2/6/14" and a container labeled "Water and Kerosene from Steam Plant, X-690, 3/7/14". The walk-through continued to Room 213. Mr. Pyles showed the inspectors ten 5-gallon SAA containers. The walk-through continued to Room #223. Mr. Pyles showed the inspectors a 5-gallon SAA container that was empty. The walk-through continued to Room #266. Mr. Pyles showed the inspectors a 5-gallon SAA container. The walk-through continued to Room #244. Mr. Pyles showed the inspectors a 5-gallon SAA container labeled "Leachate from X-326". The walk-through continued to Room #263. Mr. Pyles showed the inspectors three 5-gallon SAA containers. The walk-through continued to Room # 260. Mr. Pyles showed the inspectors four 5-gallon SAA containers. The walk-through continued to Room #241. Mr. Pyles showed the inspectors one 5-gallon SAA container. The walk-through continued to the TCLP Laboratory Room #254. Mr. Pyles showed the inspectors two 5-gallon SAA containers. The walk-through continued to Room #238. Mr. Pyles showed the inspectors several SAA polybottle containers and a 5-gallon SAA container. The walk-through continued to Room #281. Mr. Pyles introduced Ms. Tina Bingen. Ms. Bingen showed the inspectors five 5-gallon SAA containers. The walk-through continued to Room #285. Mr. Pyles showed the inspectors four 5-gallon SAA containers and a 30-gallon SAA container. Inspector Francis observed a container labeled "Acidic Sample Waste" with a spigot over a sink. Mr. Pyles told the inspectors that acidic waste is neutralized before putting it down the drain. The walk-through continued to Room #203. Mr. Pyles showed the inspectors a 5-gallon used oil container and a 5-gallon SAA container. The walk-through continued to the Spectroscopy Laboratory Room #216. Mr. Pyles showed the inspectors a 5-gallon SAA container. Inspector Francis observed four 5-gallon containers connected to ICP analytical instruments. Mr. Pyles introduced Mr. Al Shultz in the Spectroscopy Laboratory. Mr. Shultz told the inspectors that the ICP liquid waste contains 5% HNO<sub>3</sub> and 5% HCL which is neutralized between pH 4 and 10 and then placed down the drain. The walk-through continued to Building X-670. Mr. Williams showed the inspectors a used oil tote outside of the building. Inspector Francis noted that the tote was labeled "Used Oil". The walk-through continued through Building X-670, then to Building X-690, and then to Building XT-847. At Building XT-847, Ms. Mabel Tanner and Ms. Barbara Halcomb showed the inspectors a hazardous waste less than 90-day accumulation area (Area C-2) which was empty. The walk-through continued to a 55-gallon SAA container utilized for broken used fluorescent lamps at Column D18. Ms. Tanner told the inspectors that used lamps and used lead acid batteries are shipped to USA Lamp and Ballast, Cincinnati, Ohio and the used oil is picked up by Glockner Oil, Piketon, Ohio. Inspector Francis observed several boxes of universal waste used lamps in this area which were labeled and dated "1/10/14". The walk-through continued to another hazardous waste less than 90-day accumulation area at Column N-2. Ms. Tanner showed the inspectors a 55-gallon container labeled "D002, 2/18/14", a 55-gallon container labeled "D039,

2/13/14", and a 55-gallon container labeled "D002, 2/14/14". The inspection group returned to a conference room in Building XT-847 to review records. The inspectors reviewed hazardous waste less than 90-day accumulation area weekly inspection logs. The inspection continued at Building X-1007. Mr. Guilliams showed the inspectors two 5-gallon universal waste containers. The inspection group went to Building X-157A to review records.

### **Records Review**

A records review was conducted. The inspection team requested to review hazardous waste manifests, universal waste and used oil shipping records, personnel training information, weekly inspection logs, waste profiles for hazardous waste in storage, and the latest version of the contingency plan. The inspectors reviewed hazardous waste manifests since the date of the last inspection, two years of personnel training records, waste profiles, and weekly inspection logs. The inspectors reviewed off-site hazardous waste manifests. Hazardous waste was being shipped to Energy Solutions, Clive Utah (UTD982598898), DSSI/Permafix, Kingston, Tennessee (TND982109142), Perma-Fix, Oak Ridge, Tennessee (TNR000005397), EQ Detroit, Detroit, Michigan (MID980 991 566), Chemical Waste Management, Emelle, Alabama (ALD000622464). The last off-site shipment was dated February 27, 2014. Universal Waste was being shipped to USA Lamp and Ballast Recycling, Cincinnati, Ohio, and the date of the last off-site shipment was 1/21/2014. Used oil was picked up by Glockner Oil, Piketon, Ohio. The inspectors reviewed a Contingency Plan that was last updated January 2014. The Waste Minimization Report was dated September 10, 2013. Mr. Guilliams provided the inspectors with some information on the closing of the Paint Shop hazardous waste less than 90 day accumulation area in Building X-720.

### **Closing Conference**

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. U.S. DOE and FBP would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, and completed inspection checklists. In addition, Inspector Francis discussed the inspection of Building X-710 and a manifest recordkeeping issue. Inspector Francis provided a U.S. EPA Small Business Resources information sheet, a U.S. EPA Region 5 Pollution Prevention contact sheet, a U.S. EPA Managing Used Oil Advice for Small Businesses fact sheet, and an Ohio EPA Pollution Prevention Assistance brochure to Mr. Guilliams.

### **Attachments**

Inspection Checklists.





**RCRA HAZARDOUS WASTE GENERATOR  
INSPECTION CHECKLIST**

Company: U.S. DOE Portsmouth Gaseous Diffusion Plant EPA ID#: OH7890008983

Street: 3930 US Route 23 South City: Piketon

County: Pike State: Ohio Zip: 45661

Mailing Address: Same  
(If different from above)

Telephone: 740-897-3072 Fax #: \_\_\_\_\_

Owner/Operator: U.S. DOE and FBP  
(If different from above)

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: Ohio Zip: \_\_\_\_\_

Inspection Date(s): 3/24/2014 Time(s): 8:00 am

Inspection Announced? ☒ Yes ☐ NO If so, how much advance notice given? \_\_\_\_\_

	<b>Name</b>	<b>Affiliation</b>	<b>Telephone</b>
Inspectors:	Walt Francis	U.S. EPA	312-353-4921
	Melody Stewart	Ohio EPA	740-380-5256
Facility Representative:	Amy Lawson	U.S. DOE	740-897-2112
	Chris Guilliams	Fluor-B&W Portsmouth, LLC	740-897-3863

Complete All Other Applicable Checklists	
Generator Classification	Waste Management Activity
<input type="checkbox"/> Conditionally Exempt SQG (CESQG)	<input checked="" type="checkbox"/> Containers
<input type="checkbox"/> Small Quantity Generator (SQG)	<input type="checkbox"/> Tank(s)
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)	<input type="checkbox"/> Land Disposal Requirements (LDR)
<input type="checkbox"/> No Generation	<input checked="" type="checkbox"/> Used Oil
	<input checked="" type="checkbox"/> Universal Waste
	<input type="checkbox"/> Other

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month

SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month

LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds

**COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY  
NOTE TO THE INSPECTOR**

**STATE PART B HAZARDOUS WASTE PERMIT  
INSPECTION CHECKLIST**

**DIVISION OF HAZARDOUS WASTE MANAGEMENT  
OHIO EPA  
April 2012**

**OHIO PART B PERMITTED FACILITY  
RCRA INSPECTION CHECKLIST**

Facility: Portsmouth Gaseous Diffusion Plant Ohio Permit #: 04-66-0680

Co-operator: Fluor-B&W Portsmouth, LLC

Address: 3930 U.S. Route 23 South  
Piketon, OH 45661

USEPA ID#: OH7890008983

Facility Phone: 740-897-5010

County: Pike

Time: 7:45 am

Inspection Date: 3/24/2014 to 3/26/2014

Advance notice of inspection given? X (Yes)      (No)

If so, how far in advance?                     

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspector(s):	Walt Francis	U.S. EPA	312-353-4921
	Melody Stewart	Ohio EPA	740-380-5256
Facility Representative(s):	Amy Lawson	U.S. DOE	740-897-2112
	Chris Guilliams	Fluor-B&W Portsmouth, LLC	740-897-3863

Is facility operating as a generator? Yes   X   No           

If so, complete the applicable sections of the Generator Requirements checklist for wastes being managed under generator status.

**PERMIT STATUS**

Permit Issued:	March 25, 2011
Permit Effective Date:	March 25, 2011
Permit Expiration Date:	March 25, 2021

STORAGE		TREATMENT		DISPOSAL	
X	Container		Tank		Injection Well
	Tank		Surface Impoundment		Landfill
	Waste Pile		Incinerator		Land Application
	Surface Impoundment		Thermal Treatment		Surface Impoundment

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**04-66-0680**

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## PROCESS DESCRIPTION

Historically, the main function of the DOE-PORTS facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in UF6 feedstock which contains 0.711% U235. In 1993, DOE began leasing the uranium enrichment production and operations facilities at PORTS to the United States Enrichment Corporation (USEC). Uranium was enriched at the site by USEC until May 2001, at which time the production facilities were placed into a cold standby mode. During cold standby, the process buildings were maintained with a restart capability. DOE terminated the cold standby program in September 2005 and replaced it with a cold shutdown program, which no longer maintains the gaseous diffusion restart capability. The PORTS site is owned by DOE and the uranium enrichment facilities are in the process of being transitioned back to DOE from USEC. Ongoing activities at the facility include decontamination and decommissioning of facility buildings, ongoing site environmental restoration, and maintenance of the permitted hazardous waste storage area.

## WASTE MANAGEMENT, GENERATION AND AMOUNT

Uranium contaminated hazardous wastes (mixed waste) which were generated by USEC and DOE are stored on-site in DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 DOE moratorium on off-site waste shipment. A large percentage of the waste generated at PORTS is DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for DOE and USEC. DOE has in the past sent some waste off-site (to USDOE Oakridge) for treatment (incineration) prior to final disposal. Treatment residuals had been returned to DOE for storage in the interim prior to their final disposal.

### Hazardous

The DOE Part B permit lists numerous hazardous waste codes for wastes that are generated by the above processes and the environmental restoration. These are stored in drums ranging in size from 30 to 110 gallon capacity, 5 gallon containers, 20 gallon lab packs, 5' cans, 4'x4'x6' boxes, 4'x4'x8' boxes, polybottles and laboratory bottles.

### Nonhazardous

A wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes.

## **HAZARDOUS WASTE MANAGEMENT UNITS**

The following DOE-owned permitted storage facilities were inspected during the CEI:

In addition, DOE-owned and operated HWMUs and SAAs were inspected in the following buildings:

## **REGULATORY/ENFORCEMENT HISTORY**

As a result of violations of state and federal hazardous waste regulations found during the 1987, 1988, and 1989 OEPA RCRA inspections, USDOE and OEPA entered into a Consent Decree governing restoration of the environment at DOE-PORTS.

On October 4, 1995, DFFOs were signed which allowed DOE to store LDR wastes in excess of one year, so long as waste is being stored in compliance with the orders and an approved site treatment plan. These orders supercede the May 18, 1993, DFFOs.

On February 24, 1998, DOE, LMES and Ohio signed DFFOs and a Consent Order regarding past violations and the management of DUF6 and LiOH. This order was amended on March 12, 2004, June 23, 2005, February 22, 2008 and March 28, 2011. The latest amendment added Fluor-B&W Portsmouth, LLC and Babcock & Wilcox Conversion Services, LLC to the order.

On March 18, 1999, DOE and Ohio EPA signed DFFOs. These DFFOs provide exemptions to DOE and integrate the following unclosed units into the CMS/CMI process: X-749, X-231B, X-701C, X701B, X-230J7, and X-744Y.

✓ A Part B permit was issued to DOE and its current co-operator, Bechtel Jacobs, for the X-7725 and X-326 storage facilities on March 25, 2011.

On April 13, 2010, DOE signed the Director's Final Findings and Orders for Removal Action and Remedial Investigation and Feasibility Study and Remedial Design and Remedial Action (DFF&O). The DFF&O outline the process for decontamination and decommissioning of the facility buildings.

## GENERAL CONDITIONS OF PERMIT

### GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: Yes\_\_\_ No ☒ N/A \_\_\_ RMK#\_\_\_
- a. Is the permittee continuing any activity regulated by the permit after the expiration date of the permit? Yes\_\_\_ No\_\_\_ N/A ☒ RMK#\_\_\_
- b. Has the facility submitted an application for a permit renewal to the director no later than 180 days prior to the expiration date of the permit? (Or upon a later date if the permittee can demonstrate good cause for late submittal.) [Condition A.6.(a)] Yes\_\_\_ No\_\_\_ N/A ☒ RMK#\_\_\_
- NOTE:** *The permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:*
- A. The permittee has submitted a timely and complete application for a renewal permit under OAC rule 3745-50-40; and
- B. Through no fault of the permittee, a new permit has not been issued pursuant to OAC rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]
2. Has the permittee submitted the annual permit fee, payable to Treasurer, State of Ohio, to Ohio EPA on or before the anniversary of the date of issuance during the term of the permit? [Condition A.26] Yes ☒ No\_\_\_ N/A \_\_\_ RMK#\_\_\_
3. Is the permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit? [Condition A.1.(b) and A.5] Yes\_\_\_ No ☒ N/A \_\_\_ RMK#\_\_\_
4. Have any provisions of the permit been identified as invalid? [Condition A.4.] Yes\_\_\_ No ☒ N/A \_\_\_ RMK#\_\_\_
5. Has the facility identified any instances of noncompliance with the permit, RC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so: Yes\_\_\_ No ☒ N/A \_\_\_ RMK#\_\_\_

- a. Did the facility immediately report orally the following to Ohio EPA's Emergency Response Section within 24 hours of becoming aware of the circumstance(s): [Condition A.20.(a)]

- i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and

Yes\_\_\_ No\_\_\_ N/A ☒ RMK#\_\_\_

- ii. Information concerning a release of hazardous waste, fire or explosion at the facility which could threaten human health or the environment outside the facility, including a description of:

- A. Name, address and telephone number of the owner or operator?

Yes\_\_\_ No\_\_\_ N/A ☒ RMK#\_\_\_

- B. Name, address and telephone number of the facility?

Yes\_\_\_ No\_\_\_ N/A ☒ RMK#\_\_\_

- C. Name and quantity of material(s) involved?

Yes\_\_\_ No\_\_\_ N/A ☒ RMK#\_\_\_

- D. The extent of injuries, if any?

Yes\_\_\_ No\_\_\_ N/A ☒ RMK#\_\_\_

- E. An assessment of the actual or potential hazard to the environment and human health outside the facility where this is applicable?

Yes\_\_\_ No\_\_\_ N/A ☒ RMK#\_\_\_

- F. Estimated quantity and disposition of recovered material that resulted from the incident?

Yes\_\_\_ No\_\_\_ N/A ☒ RMK#\_\_\_

6. Did the permittee provide a written report to Ohio EPA's Emergency Response Section and DHWM, SEDO within five days of the time the permittee became aware of the circumstances reported in Question 5? [Condition A.21.] If so did the report contain:

Yes\_\_\_ No\_\_\_ N/A ☒ RMK#\_\_\_

- a. A description of the noncompliance and its cause (including exact dates and times)?

Yes\_\_\_ No\_\_\_ N/A ☒ RMK#\_\_\_

- b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue?

Yes\_\_\_ No\_\_\_ N/A ☒ RMK#\_\_\_



- c. Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance?

Yes\_\_\_No\_\_\_ N/A X RMK#\_\_\_

**Note:** The permittee need not comply with the five day written report requirement if the director, upon good cause shown by the permittee, waives that requirement and the permittee submits a written report within 15 days of the time the permittee becomes aware of the circumstances. [Condition A.21.(c)]

7. Has the permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8]

Yes\_\_\_No\_\_\_ N/A X RMK#\_\_\_

8. Has the permittee identified any other instances of noncompliance not provided for in Question 5?

Yes\_\_\_No\_\_\_ N/A X RMK#\_\_\_

- a. If so, did the permittee report to the director within a month of the time at which the permittee is aware of such noncompliance? [Condition A.22.]

Yes\_\_\_No\_\_\_ N/A | RMK#\_\_\_

- b. Do the reports provided contain the information set forth in Condition A.20?

Yes\_\_\_No\_\_\_ N/A | RMK#\_\_\_

9. Has the permittee planned any physical alterations or additions to the permitted facility?

Yes\_\_\_No\_\_\_ N/A X RMK#\_\_\_

- a. If so, has the facility provided Ohio EPA with notice of such changes? [Condition A.15]

Yes\_\_\_No\_\_\_ X N/A \_\_\_ RMK#\_\_\_

**Note:** Such notification does not waive the permittee's duty to comply with the permit pursuant to Condition A.5.

### REMARKS

**PERMIT MODIFICATION, REVISION, REVOCATION**

1. Has the permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.] Yes\_\_\_No\_X N/A\_\_\_RMK#\_\_\_
2. Has the permit been transferred to a new owner or operator? [Condition A.18.] If so, Yes\_\_\_No\_X N/A\_\_\_RMK#\_\_\_
- a. Has the transfer been conducted in accordance with R.C. Chapter 3734. and the rules adopted thereunder? [Condition A.18.]; and Yes\_\_\_No\_\_\_N/A\_\_\_RMK#\_\_\_
- b. Before transferring ownership did the permittee notify the new owner in writing of the requirements of R.C. Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.] Yes\_\_\_No\_\_\_N/A\_\_\_RMK#\_\_\_
3. Has the permittee submitted reports of compliance or noncompliance with, or any progress reports on the requirements contained in any compliance schedule of the permit to Ohio EPA no later than 14 days following each scheduled date, unless otherwise specified? [Condition A.19.] Yes\_\_\_No\_\_\_N/A\_XRMK#\_\_\_
4. Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10] Yes\_\_\_No\_\_\_N/A\_XRMK#\_\_\_
5. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10] YesXNo\_\_\_N/A\_\_\_RMK#\_\_\_
6. Has the permittee become aware that it failed to submit any relevant facts in the permit or issuance proceedings or that it submitted incorrect or incomplete information in permit issuance proceedings or other submissions to Ohio EPA or the HWFB? If so, Yes\_\_\_No\_XN/A\_\_\_RMK#\_\_\_

a. Has the permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

7. Is the permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.(c)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

8. Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### REMARKS

### **SITE ENTRY - AVAILABILITY OF RECORDS**

1. As specified in Condition A.11., has the permittee allowed the director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, to:

a. Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit?

Yes ☒ No ☐ N/A ☐ RMK# ☐

b. Have access to and copy any records required to be kept under the conditions of the permit?

Yes ☒ No ☐ N/A ☐ RMK# ☐

c. Inspect at reasonable times facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit?

Yes ☒ No ☐ N/A ☐ RMK# ☐

d. Sample, document, or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734. and the rules adopted thereunder?

Yes ☒ No ☐ N/A ☐ RMK# ☐

### **RECORDKEEPING REQUIREMENTS**

#### **CONFIDENTIALITY**

1. Has the permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.25.]

Yes ☐ No ☒ N/A ☐ RMK# ☐

#### **OPERATING RECORD**

2. Is the permittee maintaining a written operating record at the facility as set forth in OAC rule 3745-54-73 and Condition B.22. of the permit which contains the following elements:

- a. A description and the quantity of each hazardous waste received? Yes ☒ No ☐ N/A ☐ RMK# ☐
- b. Method(s) and date(s) of treatment, storage or disposal at the facility? Yes ☒ No ☐ N/A ☐ RMK# ☐
- c. The location of each hazardous waste within the facility and the quantity at each location? Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Is the permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents as part of its operating record: [Condition A.28.]
- a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the conditions of the permit? Yes ☒ No ☐ N/A ☐ RMK# ☐
- b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit? Yes ☒ No ☐ N/A ☐ RMK# ☐
- c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit? Yes ☒ No ☐ N/A ☐ RMK# ☐
- d. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit? Yes ☒ No ☐ N/A ☐ RMK# ☐
- e. Inspection schedules developed in accordance with OAC rules 3745-54-15 and 3745-55-74 and the conditions of the permit? Yes ☒ No ☐ N/A ☐ RMK# ☐
4. Have any of the documents identified in Question #3 been revised as required by the permit? If so,
- a. Has the permittee submitted the revisions to Ohio EPA? [Condition A.28.(b)] Yes ☐ No ☒ N/A ☐ RMK# ☐
- b. Has the permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)] Yes ☐ No ☐ N/A ☒ RMK# ☐
5. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of inspection? [Condition A.28.(c)] Yes ☒ No ☐ N/A ☐ RMK# ☐

## ANNUAL REPORT REQUIREMENT

6. Is the permittee complying with annual report requirements set forth in OAC rule 3745-54-75 and the additional report requirements set forth in OAC rule 3745-54-77 and the conditions of the permit? [Condition B.25.]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

## SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

7. In compliance with Condition A.12.(b) of the permit, do the permittee's records of monitoring information specify the:

a. Date(s), exact place(s), time(s) and method(s) of sampling or measurement?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

b. Individual(s) who performed the sampling or measurement?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

c. Date(s) analyses were performed?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

d. Individual(s) who performed the analyses?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

e. Analytical technique(s) or method(s) used?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

f. Results of such analyses?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

8. Have the methods used to obtain a representative sample of the waste to be analyzed included the appropriate SW-846 Method or an equivalent method specified in the approved waste analysis plan? [Condition A.12.(a)]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

9. Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the permittee? If so,

Yes \_\_\_ No ☒ N/A \_\_\_ RMK# \_\_\_

a. Have the submittals been signed and certified according to OAC rules 3745-50-58(K) and 3745-50-42? [Condition A.13.]

Yes \_\_\_ No \_\_\_ N/A ☒ RMK# \_\_\_

## WASTE MINIMIZATION REQUIREMENTS

10. Has the permittee submitted a Waste Minimization Report to Ohio EPA meeting the requirements of Condition A.29. of the permit within 180 days of permit journalization?

Yes ☒ No ☐ N/A ☐ RMK# ☐

a. Following the first submittal as identified above in Question #10, has the permittee submitted biennial updates to this report as required by Condition A.29.(c)?

Yes ☒ No ☐ N/A ☐ RMK# ☐

## REMARKS

### **OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS**

1. Is all hazardous and mixed waste transported from the facility by a properly registered transporter of hazardous and mixed waste in accordance with all applicable laws, rules and standards? [Condition A.16.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### **MANIFEST REQUIREMENTS/WASTES RECEIVED ON-SITE**

2. Upon receipt of the manifests, has the permittee signed and dated each copy of the manifest? [OAC 3745-54-71(A)(1); Condition B.24.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
3. For any significant discrepancies identified upon receipt of the manifest(s): did the permittee note such discrepancies on the manifest(s) in accordance with OAC rule 3745-54-71(A)(2) and Condition B.24?
- a. Did the permittee attempt to reconcile the discrepancy? [Condition B.24.] Yes \_\_\_ No \_\_\_ N/A ☒ RMK# \_\_\_
- b. If the discrepancy was not resolved within 15 days: did the permittee submit a report, including a copy of the manifest, to the director in accordance with OAC rule 3745-54-72(B)? [Condition B.24.] Yes \_\_\_ No \_\_\_ N/A ☒ RMK# \_\_\_
4. Does the permittee immediately give the transporter at least one copy of the signed manifest? [OAC 3745-54-71(A)(3); Condition B.24.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
5. Does the permittee provide the generator with a copy of the manifest within 30 days of receipt of waste on-site? [OAC 3745-54-71(A)(4); Condition B.24.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
6. Does the permittee retain a copy of each manifest on-site for at least three years from the date of delivery? [OAC 3745-54-71(A)(5); Condition B.24.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
7. Has the permittee received any hazardous waste or mixed waste from off-site, other than as described in Condition B.2(b)? Yes \_\_\_ No ☒ N/A \_\_\_ RMK# \_\_\_



## **WASTE ANALYSIS/WASTE ANALYSIS PLAN**

### **GENERAL REQUIREMENTS**

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with OAC Chapters 3745-54 to 3745-57 and Condition B.3 of the permit (Section C of the approved permit application)? [OAC 3745-54-13(A)(1)] Yes ☒ No ☐ N/A ☐ RMK# ☐
2. Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? If so, Yes ☐ No ☒ N/A ☐ RMK# ☐
- a. Were the waste analysis procedures described in Section C of the approved permit application followed? Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Is the permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of OAC rule 3745-54-13? [Condition B.3.] Yes ☒ No ☐ N/A ☐ RMK# ☐
4. Is the permittee maintaining waste analysis data in the facility's operating record as required by OAC rule 3745-54-73 and Condition B.22. of the permit? Yes ☒ No ☐ N/A ☐ RMK# ☐

### **WASTE ANALYSIS QUALITY ASSURANCE REQUIREMENTS**

5. Is the permittee verifying the analysis of each waste stream annually as part of its quality assurance program in accordance with SW-846? [Condition B.3.] Yes ☒ No ☐ N/A ☐ RMK# ☐
6. In accordance with Condition B.3. of the permit, does the permittee's quality assurance plan ensure that the permittee is, at a minimum:
- a. Maintaining property functional instruments? Yes ☒ No ☐ N/A ☐ RMK# ☐
- b. Using approved sampling/analytical methods? Yes ☒ No ☐ N/A ☐ RMK# ☐

c. Verifying the validity of sampling and analytical procedures and performance of correct calculations?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

7. If the permittee uses a contract laboratory to perform analyses, did the permittee inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**REMARKS**

## GENERAL INSPECTION REQUIREMENTS

1. Is the permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of OAC rule 3745-54-15? [Condition B.5.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Does the permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [OAC 3745-54-15(A)(1)(2)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
3. Is the permittee following the approved inspection schedule for inspecting: monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment as specified in OAC rule 3745-54-15?
  - a. Is the schedule kept at the facility? [OAC 3745-54-15(B)(2)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - b. Does the schedule identify the types of problems which are to be looked for during the inspection? [OAC 3745-54-15(B)(3)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - c. Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [OAC 3745-54-15(B)(4)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
4. Does the permittee remedy deterioration or any malfunctions discovered by an inspection as required by OAC rule 3745-54-15(C)? [Condition B.5.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
5. Is the permittee maintaining records of inspections for a minimum of three years? [Condition B.5.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
6. In accordance with OAC rule 3745-54-15(D) and Condition B.5. of the permit, do inspection records contain the following information:
  - a. Date and time of inspection? Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

- b. Signature of inspector? Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. Notation of observations made? Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- d. Date/nature of any repairs or other remedial actions? Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### SECURITY PROVISIONS/FACILITY OPERATION

1. Is the permittee complying with the security provisions of OAC rule 3745-54-14(B)(1) and B(2) and (C) and Section F of the approved permit application, including the following: [Condition B.4.]
- a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility; or Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. A means to control entry, at all times, through gates or other entrances, to the active portion of the facility? Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. In accordance with OAC rule 3445-54-14(C), does the permittee have signs reading <sup>↑</sup>Danger-Unauthorized Personnel Keep Out <sup>↑</sup> posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
3. Is construction, maintenance and operation of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, ground or surface waters? [Condition B.1.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

## PERSONNEL TRAINING

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of OAC rule 3745-54-16: [Condition B.6.]
- a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC 3745-54-16(A)(B)(C)] Yes\_\_ No ☒ N/A \_\_ RMK#\_\_  
*not for staff personnel -*
- b. The facility provides personnel training to new employees within six months after their date of employment as required by OAC 3745-54-16(B)? Yes\_\_ No ☒ N/A \_\_ RMK#\_\_
- c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(B)? Yes\_\_ No ☒ N/A \_\_ RMK#\_\_
2. Is the permittee maintaining personnel training records as required by OAC rule 3745-54-16(D) and of the approved application, including: written job titles, job descriptions and documented employee training records? [Condition B.6.] Yes ☒ No\_\_ N/A \_\_ RMK#\_\_

## REQUIRED EQUIPMENT

1. Is the permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.9.] Yes ☒ No\_\_ N/A \_\_ RMK#\_\_
2. Is the permittee inspecting, testing, and maintaining the equipment specified in Question #1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.10.] Yes ☒ No\_\_ N/A \_\_ RMK#\_\_
3. Whenever hazardous waste is being managed at the facility, has the permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device as required by OAC rule 3745-54-34 and Section G of the approved permit application? [Condition B.11.] Yes ☒ No\_\_ N/A \_\_ RMK#\_\_

## CONTINGENCY PLAN REQUIREMENTS

### **EMERGENCY PROCEDURES**

1. In compliance with Condition B.13.(a) of the permit, does the permittee:
- a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with:
    - i. The location and layout of the facility? Yes ☒ No ☐ N/A ☐ RMK# ☐
    - ii. Properties of hazardous waste and mixed waste managed at the facility and associated hazards? Yes ☒ No ☐ N/A ☐ RMK# ☐
    - iii. Places where facility personnel will normally be working? Yes ☒ No ☐ N/A ☐ RMK# ☐
    - iv. Entrances to and roads inside the facility? Yes ☒ No ☐ N/A ☐ RMK# ☐
    - v. Evacuation routes as depicted in Section G of the permit application? Yes ☒ No ☐ N/A ☐ RMK# ☐
  - b. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit?; and Yes ☒ No ☐ N/A ☐ RMK# ☐
  - c. Familiarize local police and fire departments, local hospitals and other local emergency services with the properties of hazardous waste and mixed waste managed at the facility and the types of injuries which could result from fires, explosions or a release of hazardous wastes at the facility? Yes ☒ No ☐ N/A ☐ RMK# ☐
2. Is the permittee in compliance with the requirements of OAC rule 3745-54-56 and Section G of the approved permit application regarding emergency procedures? [Condition B.20.] Yes ☒ No ☐ N/A ☐ RMK# ☐

### EMERGENCY AUTHORITIES

3. Has a state or local agency declined to enter into the arrangements set forth in OAC rule 3745-54-37(A)? If so, Yes\_\_\_ No\_\_\_ ☒ N/A \_\_\_ RMK#\_\_\_
- a. Has the permittee documented the refusal in the operating record as required by OAC rule 3745-54-37(B)? [Condition B.13.(b)] Yes\_\_\_ No\_\_\_ N/A ☒ RMK#\_\_\_
4. Has the permittee, in accordance with OAC rule 3745-54-53 submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local authorities, agencies and response contractors designated in the approved contingency plan? [Condition B.18.] Yes ☒ No\_\_\_ N/A \_\_\_ RMK#\_\_\_
5. Has the permittee notified the agencies in Question #4, in writing, within ten days of the effective date of any amendments or revisions to the Plan? [Condition B.18.(b)] Yes ☒ No\_\_\_ N/A \_\_\_ RMK#\_\_\_
6. Has the permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to the Ohio EPA, Division of Emergency and Remedial Response in accordance with OAC rule 3745-54-53? [Condition B.18.(c)] Yes ☒ No\_\_\_ N/A \_\_\_ RMK#\_\_\_

### EMERGENCY COORDINATOR

7. Is the permittee in compliance with the requirements of OAC rule 3745-54-55 with regard to the emergency coordinator? [Condition B.19.] Yes ☒ No\_\_\_ N/A \_\_\_ RMK#\_\_\_

### AMENDMENT OF PLAN

8. Is the permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17.] Yes ☒ No\_\_\_ N/A \_\_\_ RMK#\_\_\_

**Note:** Also see Question #4 of RECORDKEEPING REQUIREMENTS to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.

## IMPLEMENTATION OF PLAN

9. Has there been a fire, explosion or release of hazardous waste or mixed waste or constituents at the facility since the last date of inspection as described by Condition B.14. of the permit? If so, Yes\_\_\_No\_\_\_☒N/A\_\_\_RMK#\_\_\_
- a. Did the permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC rule 3745-54-56? [Condition B.14.] Yes\_\_\_No\_\_\_N/A\_\_\_☒RMK#\_\_\_
- b. Did the permittee collect and manage released material, emergency response material and by-products as hazardous waste or mixed waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules? [Condition B.16.] Yes\_\_\_No\_\_\_N/A\_\_\_☒RMK#\_\_\_
- c. Within 15 days of the incident did the permittee submit, to the director, a written report of the incident? If so, Yes\_\_\_No\_\_\_N/A\_\_\_☒RMK#\_\_\_
- i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23.] **Note:** See also Conditions A.21. and A.22. of the permit for additional reporting/recordkeeping requirements. Yes\_\_\_No\_\_\_N/A\_\_\_☒RMK#\_\_\_
- d. Did the permittee note in the operating record the time, date and details of any incident that required the implementation of the approved contingency plan? [Condition B.23.] Yes\_\_\_No\_\_\_N/A\_\_\_☒RMK#\_\_\_

## REMARKS



### CLOSURE PLAN/AMENDMENT

1. Is the permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC rule 3745-55-12? [Condition B.29.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Has the permittee amended the closure plan? If so, Yes \_\_\_ No ☒ N/A \_\_\_ RMK# \_\_\_
- a. Has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28.] Yes \_\_\_ No \_\_\_ N/A ☒ RMK# \_\_\_

**NOTE:** Also see RECORDKEEPING REQUIREMENTS (Question #4) in order to verify that any changes to the closure plan were submitted in accordance with OAC rule 3745-50-51.

### CLOSURE ACTIVITIES

3. Has the permittee closed the facility? If so, Yes \_\_\_ No ☒ N/A \_\_\_ RMK# \_\_\_
- a. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26.] Yes \_\_\_ No \_\_\_ N/A ☒ RMK# \_\_\_
- b. Did the permittee carry-out the approved closure plan as set forth in the permit application and terms and conditions of the permit? [Condition B.26.] Yes \_\_\_ No \_\_\_ N/A ☒ RMK# \_\_\_
- c. After receiving the final volume of hazardous waste, did the permittee remove from the facility all hazardous waste and mixed waste and complete closure activities in accordance with the schedule specified in the approved closure plan and as required by OAC rule 3745-55-13? [Condition B.31.] Yes \_\_\_ No \_\_\_ N/A ☒ RMK# \_\_\_
- d. Has the permittee decontaminated and/or disposed of all facility equipment, structures and soils as required by OAC rule 3745-55-14 and the approved closure plan? [Condition B.32.] Yes \_\_\_ No \_\_\_ N/A ☒ RMK# \_\_\_
- e. Did the permittee notify Ohio EPA's Southeast District Office within five working days prior to all rinseate and soil sampling? [Condition B.32.(b)] Yes \_\_\_ No \_\_\_ N/A ☒ RMK# \_\_\_
- f. Has the permittee certified that the facility has been closed in accordance with the specifications in the approved closure plan as required by OAC rule 3745-55-15? [Condition B.33.] Yes \_\_\_ No \_\_\_ N/A ☒ RMK# \_\_\_

**REMARKS**

## REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

1. Is the permittee following the procedures as specified in OAC rules 3745-54-17, 3745-55-77 and Section F of the approved application when managing ignitable, reactive and/or incompatible wastes? [Conditions B.7.(a) and C.10. and C.11.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Does the permittee **not** store incompatible waste **except** in accordance with OAC rules 3745-54-17(B) and 3745-55-77, and the terms and conditions of this permit? [Condition C.11.(a)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
3. Does the permittee take precautions to prevent placing hazardous waste or mixed waste in an unwashed container that previously held an incompatible waste or material? [Condition C.11.(b)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
4. Does the permittee ensure that all containers of incompatible wastes are physically separated from other incompatible wastes or materials by a wall, berm, dike, or other device in accordance with OAC rule 3745-55-77 and the Appendix to OAC rule 3745-55-99? [Condition C.11.(c)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Are all containers of aqueous hazardous acids ( $\text{ph} \leq 2$ ) and caustics ( $\text{ph} \geq 12.5$ ) sorted on different pallets and physically separated in different rooms? [Condition C.11.(c)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. Are aqueous acids and caustics in poly bottles, and other containers requiring nuclear criticality safety spacing physically separated in the same room by a dike? [Condition C.11.(c)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. Are containers of cyanides and sodium metals being stored in rooms physically separate from other incompatible wastes or other incompatible materials? [Condition C.11.(c)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

5. Does the permittee provide electrical grounding for all containers, tanks and transport vehicles during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(b)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
6. Does the permittee provide and require the use of spark proof tools during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(c)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
7. Does the permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.7.(d)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
8. As required by OAC rule 3745-55-76, does the permittee store containers of ignitable or reactive wastes greater than 15 meters (50 feet) away from the Portsmouth Gaseous Diffusion Plant reservation boundary? [Condition C.10.(a)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**REMARKS**

### STORAGE OF HAZARDOUS WASTES IN CONTAINERS

**NOTE:** The requirements of permit Condition C do not apply to the permittee's activities as a generator accumulating hazardous waste for < 90 days per OAC rule 3745-52-34(A). Please complete the applicable sections of the Generator Requirements checklist to document compliance with activities associated with < 90-day accumulation of wastes.

1. Is the permittee storing in containers, only those wastes as specified in Section A of the Part B permit application? [Condition C.1.(a), C.2.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Does the permittee limit the total quantity of containerized waste in the container storage area to 133,000 gallons at any given time in the permitted container areas, located in building X-326? [Condition C.1.(a)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**NOTE:** For the purposes of compliance with the capacity limitation of the permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity. For example, a 55-gallon drum will be considered to be holding 55 gallons of waste, regardless of the actual quantity stored in the drum. [Condition C.1.(b)]

3. When accumulating waste within the permitted X-326 container storage area, does the permittee ensure that the total amount of waste (both > 90 days and < 90 days) does not exceed the maximum container storage inventory established under Condition C.1.? [Condition C.1.(c)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
4. Are hazardous wastes subject to regulation by the permit stored only at the designated container storage area described in the approved permit application? (See Section D of the permit application) [Condition C.1.(a)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
5. Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? (See Section D of the permit application) [Condition C.3.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
6. Does the permittee store hazardous waste in the types of containers described in Section D of the approved permit application? [Condition C.1.(a)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

## CONDITION OF CONTAINERS

8. Are containers holding hazardous wastes in good condition? [Condition C.3.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. If not, (e.g., severe rusting, structural defects) did the permittee transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit and OAC rule 3745-55-71? [Condition C.3.] Yes \_\_\_ No \_\_\_ N/A ☒ RMK# \_\_\_
9. Does the permittee ensure that all containers used at the facility are compatible with the hazardous waste to be stored in them as required by OAC rule 3745-55-72? [Condition C.4.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
10. Is storage conducted in the container storage containment system as described in Condition C.1. of the permit and Section D of the approved permit application? [Condition C.5.(a)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
11. Does the permittee keep all containers closed during storage except when it is necessary to add or remove waste as required by OAC rule 3745-55-73? [Condition C.5.(b)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
12. Are lab-pack wastes handled in compliance with applicable storage requirements? [Condition C.5.(c)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
13. Are lab-pack wastes packaged in drums containing absorbent material that is compatible with the wastes? [Condition C.5.(d)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

## INSPECTIONS

14. Is the permittee inspecting the container area weekly in accordance with OAC rules 3745-54-15, and 3745-54-73 and the approved inspection schedule (Section F) to detect leaking containers and deterioration of containers and the containment system? [Condition C.8.] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.8.]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

b. On days when containerized waste are added or removed to and/or from any of the permitted areas for storage, does the permittee conduct inspections as described in Section F of the approved Part B permit application and maintain the inspection results in the facility operating record? [Condition C.8.]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### CONTAINMENT SYSTEM

15. Does the permittee maintain the containment system as described in Section D of the approved Part B permit application, including: [Condition C.6.]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

a. Sufficient design to contain 10% of the total volume of the containers or the volume of the largest container, whichever is greater? [Condition C.6.(b)]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

b. A system which is free of gaps and sufficiently impervious to contain leaks and spills?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

c. Equipped with a coating which is compatible with each waste stored in the area?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

d. *For those wastes which are deemed incompatible with liner material:* Has the permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

16. Has the permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? If so,

Yes \_\_\_ No ☒ N/A \_\_\_ RMK# \_\_\_

a. Are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.6.(c)]

Yes \_\_\_ No \_\_\_ N/A ☒ RMK# \_\_\_

b. Does removal of spilled/leaked wastes and accumulated precipitation occur within 24 hours from the time the spill or leak waste is discovered? [Condition C.6.(c)]

Yes \_\_\_ No \_\_\_ N/A ☒ RMK# \_\_\_

### REQUIRED AISLE SPACE

17. Is the permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the event of an emergency to any area of the facility as required by OAC rule 3745-54-35? [Condition B.12.]

Yes ☒ No ☐ N/A ☐ RMK# ☐

### CLOSURE AND POST-CLOSURE

18. At closure of the container storage area, did the permittee remove all hazardous waste, hazardous waste residues, mixed waste and mixed waste residues from the containment system, in accordance with the procedures set forth in the approved closure plan (Section I of the permit application)? [Condition C.13.(a)]
19. During closure, if the permittee could not demonstrate that all contaminated soils could be removed, did the permittee close the unit and perform post-closure care following a plan approved by Ohio EPA? [Condition C.13.(b)]

Yes ☐ No ☐ N/A ☒ RMK# ☐

Yes ☐ No ☐ N/A ☒ RMK# ☐

### CONTAINER STORAGE OF RESIDUAL WASTE

20. Is the permittee complying with the provisions of Section C-2E of the application as amended pursuant to Condition B.2.(b) of this permit?

Yes ☒ No ☐ N/A ☐ RMK# ☐



**LAND DISPOSAL RESTRICTION REQUIREMENTS**  
**PROHIBITION AGAINST DILUTION**

1. Has the permittee updated the annual Federal Facility Compliance Act Schedule? [OAC rule 3745-270-50; Condition B.36.] Yes Y No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [OAC rule 3745-270-40 through 49; Condition B.36.(c)] Yes \_\_\_ No Y N/A \_\_\_ RMK# \_\_\_
- a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards? Yes \_\_\_ No \_\_\_ N/A 1 RMK# \_\_\_
- b. To circumvent the effective date of a prohibition (e.g., to dilute a non-wastewater waste to a wastewater to avoid complying with the non-wastewater treatment standard)? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. To otherwise avoid a prohibition in OAC rule 3745-270-30 through -39? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- d. To otherwise avoid a prohibition imposed by Section 3004(d) of RCRA? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**NOTE:** If the answer to any of Questions 2(a) through 2(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of OAC rule 3745-270-03 [Condition B.36.]. Dilution of wastes is permissible under some conditions. See OAC rule 3745-270-03(B).

**GENERATOR REQUIREMENTS**

3. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [OAC rule 3745-270-07; Condition B.36.(e)] Yes Y No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. **For determinations based solely on knowledge of the waste:** Is supporting data used to make this determination being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] Yes Y No \_\_\_ N/A \_\_\_ RMK# \_\_\_

b. **For determinations based upon analytical testing:**

Is a copy of waste analysis data being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

4. Has the generator determined the correct treatability group for each waste restricted from land disposal (e.g., wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [OAC rule 3745-270-07; Condition B.36.(e)]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

5. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [OAC rule 3745-270-07(A); Condition B.36.(e)]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

6. Does the entity generate any listed waste(s) which are restricted from land disposal? If so,

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

- a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24?

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

- b. **For listed wastes which also exhibit a characteristic:** Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [OAC rule 3745-270-09(A)]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**NOTE:** The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC rule 3745-270-09(B)].

**NOTIFICATION/CERTIFICATION**

7. **For wastes that do not meet treatment standards:** Has the generator submitted a one-time written notice to the treatment/storage facility receiving the wastes, that wastes being received do not meet treatment standards? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

If so, does the notice including the following:

- a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]

Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

- b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. The manifest number associated with the first shipment of waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- f. For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45. Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- g. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49; and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
8. **For wastes that meet treatment standards:** Does the generator submit a one-time written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- If so, does the notice/certification including the following:
- a. EPA hazardous waste identification number? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. The corresponding treatment standards and applicable prohibitions for the waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

- c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- e. Is the certification signed by the generator or an authorized representative? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- f. For contaminated soil list the constituents subject to treatment as described as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
9. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years? [OAC rule 3745-270-07(A)(8); Condition B.36.(j)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

#### STORAGE OF LAND DISPOSAL RESTRICTED WASTES

**NOTE:** The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate LDR wastes that do not meet treatment standards in tanks or containers. A LQG who stores LDR wastes on-site for greater than 90 days becomes a operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.

**NOTE:** The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [OAC rule 3745-270-50(E); 40 CFR 268.50(e)]

10. Is the owner/operator storing LDR restricted wastes in containers? If so, is each container marked with the following information in accordance with OAC rule 3745-270-50(A)(2)(a) [Condition B.36.(l)] Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. The identification of the contents? Yes ☒ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

b. The date which accumulation began? Yes

**NOTE:** A TSD facility may store LDR wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [OAC rule 3745-270-50(B)]. During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.

11. Are LDR wastes being stored at the facility for greater than one year? If so,

a. Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [OAC rule 3745-270-50(B); Condition B.36(m)]

Yes ☒ No ☐ N/A ☐ RMK#

**LARGE QUANTITY GENERATOR REQUIREMENTS**  
**COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CESQG: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.  
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.  
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.  
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

**GENERAL REQUIREMENTS**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

11.	Does the generator export hazardous waste? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>MANIFEST REQUIREMENTS</b>		
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)] <i>Box 19 not completed</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]		
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.		
17.	If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.		
<b>PERSONNEL TRAINING</b>		
21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>NOT FOR SAs Employees</i>
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>NOT FOR SAs Employees</i>
NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]		
23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
25.	Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>NOT FOR SAs Employees</i>

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26.	Does the generator keep records and documentation of:		
a.	Job titles? [3745-65-16(D)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
b.	Job descriptions? [3745-65-16(D)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
c.	Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained
Drum Picking for 710 WAS	Brian Pyle	2012 + 2013
Wing - work	Phil H. Hannon	2012 + 2013

#### CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Jan 2014	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Does the plan describe the following:	
a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

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EMERGENCY PROCEDURES			
33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.			
PREPAREDNESS AND PREVENTION			
34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:		
	a.	Internal communications or alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Verify that the equipment is listed in the contingency plan.			
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
39.	If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
SATELLITE ACCUMULATION AREA REQUIREMENTS			
43.	Does the generator ensure that satellite accumulation area(s):		
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

**NOTE:** The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

#### USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

45.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
46.	Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
47.	Are hazardous wastes stored in containers which are:	
a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**NOTE:** Record location on process summary sheets, photograph the area, and record on facility map.

48.	Is the container accumulation areas(s) inspected weekly? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**NOTE:** "Week" means 7 consecutive days per ORC§1.44(A).

49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**NOTE:** OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

**PRE-TRANSPORT REQUIREMENTS**

54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

**GENERATOR LDR CHECKLIST  
DOES NOT APPLY TO CESQGS**

**GENERAL REQUIREMENTS**

1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).*

3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive; D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.*

6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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*NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.*

*NOTE: Written documentation of this determination is not required.*

7.	Did the generator treat his HW /soil on-site to meet the LDR treatment standard?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
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*NOTE: If "Yes" see question #16.*

8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
i	Applicable HW codes?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
ii	Manifest number of the first shipment to the TSD?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
iii	A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination."	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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	a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>NOTIFICATION FORM</b>			
11.	Does the LDR Notification form contain the following information:		
	a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.			
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories			
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.			
	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.			
<b>PROHIBITED DILUTION</b>			
12.	Is the HW treated by burning?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
			If "No" go to #15.
13.	Is the HW a metal-bearing HW?		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.			
14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <u>one</u> of the following conditions apply. [3745-270-03(c)]	
	i.	Contains > 1% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

15.	Was the HW treated by wastewater treatment? <i>NEVER</i>		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<i>NOTE: If "Yes", HW is improperly being treated by dilution.</i>					
	b.	Does the waste carry the D001 code and contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<i>NOTE: If the answers to b &amp; c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].</i>					
<i>NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.</i>					
<b>GENERATOR TREATMENT</b>					
16.	Does the generator treat to meet LDRs on-site?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.				
	a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>NOTE: This is a laboratory analysis but it does not have to be kept by the generator.</i>					
	c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<b>NOTIFICATION FORM FOR GENERATOR TREATMENT</b>					
17.	a.	Contains all information in #11 a-g above and	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	If the treated HW/soil is listed.....notification contains the following certification statement:  "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:			
	i.	Prepare a one-time notification? [3745-270-09 (D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	ii.	Maintain a copy of the notice onsite? [3745-270-09(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	iii.	Include in the notification: [3745-270-09(D)]			

		1.	Name & address of receiving landfill?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		2.	Description of HW when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		3.	HW code when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		4.	Treatability group when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		5.	Underlying hazardous constituents present when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iv.		Contain the certification statement as required by 3745-270-07(B)(4)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS		
<i>Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more</i>		
<i>Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less</i>		
<b>GENERAL REQUIREMENTS</b>		
1.	Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>PROHIBITIONS</b>		
2.	Did the LQUWH dispose of universal waste? [3745-273-31(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Did the LQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-37 or managing specific wastes as provided in OAC rule 3745-273-33? [3745-273-31(B)] (this change makes it like the SQUWH checklist)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<b>WASTE MANAGEMENT AND LABELING/MARKING</b>		
<b>UNIVERSAL WASTE BATTERIES</b>		
4.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(A)(1)] (Added rule #)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
8.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>UNIVERSAL WASTE LAMPS</b>		
9.	Does the LQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(D)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous constituents to the environment? [3745-273-33(D)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><b>NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.</b></p>		
11.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamps?" [3745-273-34(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>



<b>ACCUMULATION TIME</b>		
12.	Is the waste accumulated for less than one year? [3745-273-35(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-35(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Accumulation is defined as date generated or date received from another handler.</i>		
13.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-35(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	If yes, describe below: <i>1285 ACC-1124 JHJMS → 1/21/2014</i>	
<b>EMPLOYEE TRAINING</b>		
14.	Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>RESPONSE TO RELEASES</b>		
15.	Are releases of universal waste and other residues immediately contained? [3745-273-37(A)] (This now mirrors SQUWH checklist)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16.	Is the material released characterized? [3745-273-37(B)] (This now mirrors SQUWH checklist)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
17.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-37(C)] (This now mirrors SQUWH checklist)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>OFF-SITE SHIPMENTS</b>		
<i>NOTE: If a LQUWH self-transport wastes, then the handler must comply with the Universal Waste transporter requirements.</i>		
18.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Is the handler aware of DOT requirements for packaging and shipping? If not, make aware of 40 CFR 171-180.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
21.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. If yes, did the originating handler receive the waste back or agree to where shipment was sent? [3745-273-38(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
22.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler to discuss and do <u>one of the following</u> : (This now mirrors SQUWH checklist)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a. Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-38(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
23.	If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>TRACKING UNIVERSAL WASTE SHIPMENTS</b>		
24.	Are universal wastes received from another handler? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

	a.	Is a record (log, invoice, manifest, bill of lading, or other shipping document) of each shipment kept? [3745-273-39(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
25.	Does the record include the following:				
	a.	Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Quantity of each type of universal waste? [3745-273-39(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Date received? [3745-273-39(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
26.	Is universal waste shipped to another handler? If so:		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Is a record of each shipment kept? [3745-273-39(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
27.	Does the record include the following?				
	a.	Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Quantity of each type of universal waste? [3745-273-39(B)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Date shipped? [3745-273-39(B)(3)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
28.	Are records kept for three years? [3745-273-39(C)(1)&(2)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<b>EXPORTS</b>					
29.	Is waste being sent to a foreign destination? If so:		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56 and 3745-52-57? [3745-273-40(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-40(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

**USED OIL INSPECTION CHECKLIST  
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

*NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.*

**PROHIBITIONS**

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: For example, used oil contaminated scrap metal stored in a pile.*

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).*

**GENERATOR STANDARDS**

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.*

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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*NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.*

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Stopped the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**ON-SITE BURNING IN SPACE HEATER**

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

#### GENERATOR TRANSPORTATION

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24] <i>Checked on</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

#### COLLECTION CENTERS AND AGGREGATION POINTS

13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.